

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Tanya Nelson

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Emergent BioSolutions Inc.

Robert G. Kramer

Katy Strei

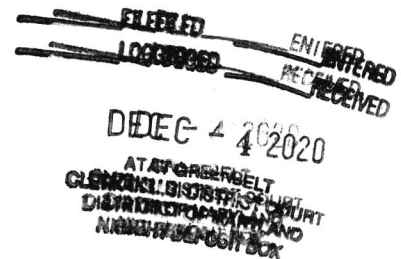
*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for Employment  
Discrimination**

Case No. PWG 20 CV 3541

*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*



**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tanya Nelson
Street Address	21 Locustwood Court
City and County	Silver Spring, Montgomery
State and Zip Code	Maryland 20879
Telephone Number	301-602-1109
E-mail Address	stevens.tanya@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Emergent BioSolutions Inc.
Job or Title (if known)	
Street Address	400 Professional Drive, Suite 400
City and County	Gaithersburg, Montgomery
State and Zip Code	Maryland 20879
Telephone Number	240-631-3200
E-mail Address (if known)	

Defendant No. 2

Name	Robert G. Kramer
Job or Title (if known)	President and Chief Executive Officer
Street Address	400 Professional Drive, Suite 400
City and County	Gaithersburg, Montgomery
State and Zip Code	Maryland 20879
Telephone Number	240-631-3200
E-mail Address (if known)	

Defendant No. 3

Name	Katy Strei
Job or Title (if known)	Executive Vice President, Human Resources and Chief Human Resources Officer
Street Address	400 Professional Drive; Suite 400
City and County	Gaithersburg, Montgomery
State and Zip Code	Maryland, 20879
Telephone Number	240-631-3200
E-mail Address (if known)	

*(If there are more than three defendants, attach an additional page providing the same information for each additional defendant.)*

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is:

Name	Emergent BioSolutions
Street Address	400 Professional Drive, Suite 400
City and County	Gaithersburg; Montgomery County
State and Zip Code	MD 20879
Telephone Number	240-631-3200

## II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☒ Other federal law *(specify the federal law)*:  
Equal Pay Act 29 U.S.C. § 206(d); The Fair Labor Standards Act, 29 U.S.C. § 206;

- ☐ Relevant state law *(specify, if known)*:

- ☐ Relevant city or county law *(specify, if known)*:

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☒ Failure to hire me.
- ☒ Termination of my employment.
- ☒ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts (*specify*): \_\_\_\_\_

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

B. It is my best recollection that the alleged discriminatory acts occurred on date(s) August 2012 to August 2019.

C. I believe that defendant(s) (*check one*):

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

- ☒ race African-American
- ☒ color Black
- ☒ gender/sex Female
- ☐ religion \_\_\_\_\_
- ☐ national origin \_\_\_\_\_
- ☐ age. My year of birth is \_\_\_\_\_. (*Give your year of birth only if you are asserting a claim of age discrimination.*)
- ☒ disability or perceived disability (*specify disability*)  
Anxiety, Major Depressive Disorder, and PTSD



- E. The facts of my case are as follows. Attach additional pages if needed.

The Defendants acts of discrimination and retaliation based on Nelson's race, color, gender, sex, and disability are interrelated and continuously shaped by one another. Nelson identifies and presents as an African-American female, and was diagnosed a with stress-related disorder while working at Emergent BioSolutions. Nelson was paid less than white counterparts, both male and female. Nelson was also rejected from more than 10 internal job transfers. Nelson followed company procedure to report discrimination/retaliation to SVP, Abigail Jenkins. Nelson's employment was terminated at the follow-up meeting.

Additionally, prior to the meeting where Nelson was fired, Nelson informed her manager, Rebecca Karim, and Nelson's physician submitted a request to HR revise Nelson's disability accomadation to a four-day work week.

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

#### IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

May 26, 2020

- B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.  
☒ issued a Notice of Right to Sue letter, which I received on *(date)*  
September 8, 2020

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.  
☐ less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Economic damages including back pay and associated compensation benefits;

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Liquidated damages including but not limited to treble damages for the  
practice of pay discrimination which impacted all aspects compensation;

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Reasonable attorneys' fees and costs; and

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Any other relief this Court may deem just and equitable to effectuate

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 3, 2020.

Signature of Plaintiff

Printed Name of Plaintiff

Tanya Nelson

Tanya Nelson

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address